

1 STEPHEN M. TILLERY (*pro hac vice*)
stillery@koreintillery.com
2 GARRETT R. BROSHUIS (*pro hac vice*)
gbroshuis@koreintillery.com
3 GIUSEPPE S. GIARDINA (*pro hac vice*)
ggiardina@koreintillery.com
4 **KOREIN TILLERY, LLC**
505 North 7th Street, Suite 3600
5 St. Louis, MO 63101
Telephone: (314) 241-4844
6 Facsimile: (314) 241-3525

7 GEORGE A. ZELCS (*pro hac vice*)
gzels@koreintillery.com
8 **KOREIN TILLERY, LLC**
205 North Michigan, Suite 1950
9 Chicago, IL 60601
Telephone: (312) 641-9750

10 BRUCE L. SIMON (Bar No. 96241)
bsimon@pswlaw.com
11 **PEARSON, SIMON & WARSHAW, LLP**
12 44 Montgomery Street, Suite 2450
San Francisco, CA 94104
13 Telephone: (415) 433-9000
14 Facsimile: (415) 433-9008

DANIEL L. WARSHAW (Bar No. 185365)
dwarshaw@pswlaw.com
BOBBY POUYA (Bar No. 245527)
bpouya@pswlaw.com
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 91403
Telephone: (818) 788-8300
Facsimile: (818) 788-8104

15 Attorneys for all Plaintiffs, individually and on
16 behalf of all those similarly situated

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
20 Behalf of All Those Similarly Situated,

21 Plaintiffs,

22 vs.

23 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
24 doing business as MAJOR LEAGUE
BASEBALL, et al.,

25 Defendants.

CASE NO. 3:14-cv-00608-RS

CLASS ACTION

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE CERTAIN
DOCUMENTS UNDER SEAL IN
SUPPORT OF THEIR MOTION TO
COMPEL (L.R. 7-11, 79-5)**

1 Pursuant to Civil Local Rule 79-5(b), Plaintiffs respectfully submit this administrative
 2 motion for an order permitting the filing under seal of redacted portions of Defendant Tampa Bay
 3 Rays Baseball, Ltd's Objections and Answers to Plaintiffs' First Set of Interrogatories to Personal
 4 Jurisdictional Defendants Regarding Personal Jurisdiction and Venue ("PJ Interrogatory
 5 Responses"). The PJ Interrogatory Responses are being filed in support of Plaintiffs' concurrently
 6 filed Motion to Compel Venue and Jurisdictional Discovery. The PJ Interrogatory Responses
 7 have been redacted and filed under seal because Defendant Tampa Bay Rays Baseball, Ltd.
 8 ("Tampa Bay Rays") have designated certain information contained therein as Confidential.
 9 Although, a protective order has not yet been entered in this case, the parties reached an agreement
 10 that Defendants could designate discovery responses as "Confidential" and they would be treated
 11 as such by Plaintiffs. Prior to filing this Motion the parties met and conferred regarding the scope
 12 of Defendants' confidential designations to the PJ Interrogatory Responses. Pursuant to these
 13 meet and confer efforts, Counsel for the Tampa Bay Rays confirmed that Plaintiffs could publicly
 14 file the PJ Interrogatory Responses while redacting the following information: (1) the city of
 15 residence for certain Tampa Bay Rays employees; and (2) financial information regarding certain
 16 taxes paid by the Tampa Bay Rays. These redactions were applied to the PJ Interrogatory
 17 Responses and approved by the counsel for the Tampa Bay Rays.

18 This request is supported by the accompanying Declaration of Bobby Pouya in support
 19 thereof. In compliance with Civil Local Rule 79-5(d), Plaintiffs submit herewith a proposed order
 20 and redacted and unredacted copies of the PJ Interrogatory Responses and will provide a courtesy
 21 copy of the administrative motion, declaration, proposed order, and both the redacted and
 22 unredacted versions of all documents sought to be sealed to the Court. Pursuant to Civil Local
 23 Rule 79-5(e) Plaintiffs will serve a copy of this motion on the Tampa Bay Rays. Pursuant to Local
 24 Rule 79-5(e)(1) within 4 days of the filing of the Administrative Motion to File Under Seal, the
 25 Tampa Bay Rays must file a declaration as required by subsection 79-5(d)(1)(A) establishing that

26 ///

27 ///

28 ///

1 all of the designated material is sealable.

2

3 DATED: September 3, 2014

Respectfully submitted,

4

/s/ Bobby Pouya

5

Daniel L. Warshaw (Bar No. 185365)

dwarshaw@pswlaw.com

6

Bobby Pouya (Bar No. 245527)

bpouya@pswlaw.com

7

PEARSON, SIMON & WARSHAW LLP

15165 Ventura Boulevard, Suite 400

8

Sherman Oaks, CA 91403

Telephone: (818) 788-8300

9

Facsimile: (818) 788-8104

10

Bruce L. Simon (Bar No. 96241)

bsimon@pswlaw.com

11

PEARSON, SIMON & WARSHAW LLP

44 Montgomery Street, Suite 2450

12

San Francisco, CA 94104

Telephone: (415) 433-9000

13

Facsimile: (415) 433-9008

14

Stephen M. Tillery (*pro hac vice*)

stillery@koreintillery.com

15

Garrett R. Broshuis (*pro hac vice*)

gbroshuis@koreintillery.com

16

Giuseppe S. Giardina (*pro hac vice*)

ggiardina@koreintillery.com

17

KOREIN TILLERY, LLC

505 North 7th Street, Suite 3600

18

St. Louis, MO 62101

Telephone: (314) 241-4844

19

Facsimile: (314) 241-3525

20

George A. Zelcs (*pro hac vice*)

gzels@koreintillery.com

21

KOREIN TILLERY, LLC

205 North Michigan, Suite 1950

22

Chicago, IL 60601

Telephone: (312) 641-9750

23

Facsimile: (314) 241-3525

24

Kelly M. Dermody (State Bar No. 171716)

kdermody@lchb.com

25

Anne B. Shaver (State Bar No. 255928)

ashaver@lchb.com

26

LIEFF CABRASER HEIMANN & BERNSTEIN,
LLP

27

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

28

Telephone: 415.956.1000

PEARSON, SIMON & WARSHAW, LLP
15165 VENTURA BOULEVARD, SUITE 400
SHERMAN OAKS, CALIFORNIA 91403

Facsimile: 415.956.1008

Rachel Geman (*pro hac vice*)
rgeman@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN,
LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: 212.355.9500
Facsimile: 212.355.9592

Randall K. Pulliam (*pro hac vice*)
rpulliam@cbplaw.com
CARNEY BATES & PULLIAM, PLLC
11311 Arcade Drive
Little Rock, AR 72212
Telephone: 501.312.8500
Facsimile: 501.312.8505

Brian P. Murray (*pro hac vice*)
bmurray@glancylaw.com
Lee Albert (*pro hac vice*)
lalbert@glancylaw.com
GLANCY BINKOW & GOLDBERG LLP
122 East 42nd Street
Suite 2920
New York, NY 10168
Telephone: (212) 682-5340
Facsimile: (212) 884-0988
*Attorneys for Plaintiffs in the Senne action,
Individually and All Those Similarly Situated*